

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CRYSTAL LEAP ZRT,

Plaintiff,

LONGITUDE LICENSING LIMITED

Patentee-Plaintiff,

v.

HKC CORP. LTD.; CHONGQING HKC
OPTOELECTRONICS TECHNOLOGY
CO., LTD.; AND HKC OVERSEAS LTD.,

Defendants.

CIVIL ACTION NO. 2:22-cv-00382-JRG-RSP

JURY TRIAL DEMANDED

UNOPPOSED MOTION TO EXCEED PAGE LIMITS FOR ATTACHMENT

Defendants HKC Corp. Ltd., Chongqing HKC Optoelectronics Technology Co., Ltd. and HKC Overseas Ltd. (collectively, “HKC”) file this unopposed motion to exceed the 5-page limit for attachments for discovery motions. *See* Mar. 11, 2020 Standing Order Regarding “Meet and Confer” Obligations Relating to Discovery Disputes. From the Jan. 10, 2024 hearing in this case, HKC understood the Court to request a full copy of Plaintiffs’ contentions if a motion raised the issue of whether Plaintiffs’ 19 additional products were covered by Plaintiffs’ contentions. *See* Dkt. 75 (Jan. 10, 2024 hearing) at 39:18-21 (stating, in reference to the 19 additional products, “I would need to look at [Plaintiffs’] contentions and determine whether or not I think they already fairly cover those”). This request is to allow a complete copy of Plaintiffs’ contentions, which are 536 pages in length, to be included in the record for the Court’s consideration of HKC’s Motion to Confirm that the Alleged “Substantially Similar” Products That Are Not Included in Plaintiffs’ Infringement Contentions Are Not Within The Scope Of The Case And That Further Technical Discovery For Those Specific Products Is Not Required. Therefore, HKC asks the Court to grant this limited request.

Dated: February 22, 2024

Respectfully submitted,

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Attorneys for Defendants

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 22nd day of February 2024.

/s/ Karen Johnson

Karen Johnson

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that this motion is unopposed.

/s/ Jeffrey Johnson

Jeffrey Johnson – Lead Counsel

/s/ Rudolph Fink, IV

Rudolph Fink, IV – Local Counsel